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#### REMARKS

Applicants thank the Examiner for the thorough consideration given the present application. Claims 1-7 and 9-15 are pending in this application. Claims 1, 9, and 13 are amended. Claims 1, 9, and 13 are independent. Reconsideration of this application, as amended, is respectfully requested.

# Rejections Under 35 U.S.C. §103(a)

Claims 1-3, 5, 14 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Matsui (U.S. 6,471,504) in view of Bacchi et al. (U.S. 6,105,454).

Claim 4 stands rejected as being unpatentable Matsui in view of Bacchi et al. as applied to claims 1-3, 5, 14 and 15 in further view of Hashimoto et al. (U.S. 5,860,331).

Claims 6 and 7 stand rejected as being unpatentable Matsui in view of Bacchi et al. as applied to claims 1-3, 5, 14 and 15 in further view of Brenholdt et al. (U.S. 4,693,663).

Claims 9-11 stand rejected as being unpatentable over Matsui in view of Bacchi et al. and Hashimoto et al.

Claim 12 stands rejected as being unpatentable over Matsui in view of Bacchi et al. and Hashimoto et al. as applied to claims 9-11

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above, and further in view of Brenholdt et al.

Claim 13 stands rejected as being unpatentable over Matsui in view of Bacchi et al. and Brenholdt et al.

These rejections are respectfully traversed.

# Amendments to Independent Claims 1 and 9

While not conceding the appropriateness of the rejections, but merely to advance prosecution, independent claims 1 and 9 are amended to recite a combination of elements directed to a robot for a production machine, such that when the first arm and the second arm are extended to position the chuck at a center of the production machine, substantially an entire length of the second arm extends between tie bars of the production machine, so that the length of the second arm is substantially overlapped between a movable mold and a stationary mold of the production machine.

Full support for extending the first arm 5 and the second arm 11 so as to position the chuck 15 at a center of the production machine 1, thus causing substantially an entire length of the second arm 11 to extend between tie bars 21 of the production machine 1 so as to be substantially overlapped between a movable

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mold Cm and a stationary mold Cc of the production machine 1 can been seen in FIGS. 1 and 2 of the present application.

It is respectfully submitted that the instantly amended claims patentably distinguish over the art cited by the Examiner, including Matsui, Bacchi et al. and Hashimoto et al. In contrast to the presently claimed invention, none of these cited references teaches or suggests a combination of elements such that when the first arm and the second arm are extended to position the chuck at a center of the production machine, substantially an entire length of the second arm extends between tie bars of the production machine, and the length of the second arm is substantially overlapped between a movable mold and a stationary mold of the production machine. For example, the Examiner is directed to FIG. 4 of the Matsui document, which fails to show that which is claimed in the present invention. As conceded by the Examiner (page 3 of the Office Action) Matsui fails to teach the second arm being substantially overlapped between a movable mold and a stationary Further, as can be seen in Matsui FIG 4, no portion whatsoever of the second arm 5 of Matsui extends between tie bars 72.

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Moreover, both of the Bacchi et al. and the Hashimoto et al. documents are silent about an entire length of the second arm extending between tie bars and tire length being substantially overlapped between molds of a production machine.

Accordingly independent claims 1 and 9 are in condition for allowance.

# Amendments to Independent Claim 13

Claim 13 is amended to recite a combination of elements directed to a robot for a production machine a rotation mechanism is disposed at an upper end of an injection molding machine, the rotation mechanism including a horizontal arm whose one end is supported to be rotatable about an axis extending in the vertical direction, the support base being attached to the other end of the horizontal arm, and the second arm and the chuck being moved through a space between the tie bars.

Full support for a rotation mechanism 24 disposed at an upper end 25 of an injection molding machine 1, the rotation mechanism 24 including a horizontal arm 23 whose one end 25r is supported to be rotatable about an axis extending in the vertical direction, the Appl. No. 09/753,666 Attorney Docket: 0994-0206P Amendment Filed January 23, 2004 Group: 1722 Reply to Office Action dated November 4, 2003 Page 16 of 18

support base being attached to the other end of the horizontal arm 23, and the second arm 11 and the chuck 15 being moved through a space Su between the tie bars 21 can be seen in FIG 4 of the present application.

It is respectfully submitted that claim 13 as amended is patentably distinguished over the art cited by the Examiner, including Matsui, Bacchi et al. and Brenholt et al. In contrast to the presently claimed invention, none of the cited references teaches or suggests a combination of elements, including a rotation mechanism being disposed at an upper end of an injection molding machine, the rotation mechanism including a horizontal arm whose one end is supported to be rotatable about an axis extending in the vertical direction, the support base being attached to the other end of the horizontal arm, and the second arm and the chuck being moved through a space between the tie bars.

Accordingly, independent claim 13 is in condition for allowance.

In view of the foregoing, it is respectfully submitted that independent claims 1, 9, and 13 are not disclosed or made obvious by any combination of the prior art of record, including Matsui,

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Bacchi et al., Hashimoto et al., and Brenholt et al. Since the dependent claims depend directly or indirectly from allowable independent claims 1, 9, and 13, these claims are also are allowable for at least the reasons set forth above, or due to the additional features set forth by these claims.

Therefore, reconsideration and withdrawal of the rejections under 35 U.S.C. §103(a) and allowance of all claims are respectfully requested.

# CONCLUSION

All the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. It is believed that a full and complete response has been made to the outstanding Office Action, and that the present application is in condition for allowance.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Carl Thomsen (Reg. No. 50,786) at the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any

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overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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